

\*\*E-filed 2/5/07\*\*

**BERGESON, LLP**

MICHAEL W. STEBBINS (State Bar No. 138326)

mstebbins@be-law.com

303 Almaden Boulevard, Suite 500

San Jose, CA 95110

Telephone: (408) 291-6200

Facsimile: (408) 297-6000

**LAZARE POTTER GIACOVAS & KRANJAC LLP**JAIPAT SINGH JAIN (New York State Bar No. 3898533) (*pro hac vice*)jjain@lpgk.com

950 Third Avenue

New York, NY 10022

Telephone: (212) 758-9300

Facsimile: (212) 888-0919

Attorneys for Plaintiff TCGIvega Technologies Pvt. Ltd.

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

TCGIVEGA INFORMATION  
TECHNOLOGIES PVT. LTD.,

Plaintiff,

v.

KARNA GLOBAL TECHNOLOGIES, INC.;  
KANNAN R. AYYAR; JNANA R. DASH  
AKA JNAN DASH; AND GREGORY D.  
HAWKINS,

Defendants.

CASE NO. CV-05-05222 JF/HRL

**STIPULATION AND [PROPOSED]  
ORDER EXTENDING PRE-TRIAL  
DEADLINES**

**STIPULATION**

WHEREAS, following an extension of time to respond, Defendants' responses to Plaintiff's discovery requests were served on December 11, 2006; and

WHEREAS, Defendants produced certain documents responsive to certain document

1 requests on January 22, 2007, only after a Protective Order Governing Confidential Information  
2 was negotiated between the parties and, after modification, entered by the Court on January 18,  
3 2007; and

4 WHEREAS, the parties are currently involved in the meet and confer process regarding  
5 Defendants' responses; and

6 WHEREAS, the parties previously believed that depositions would likely commence in  
7 mid-January 2007 and be completed in March 2007; and

8 WHEREAS, there has been one previous extension of the pre-trial deadlines pursuant to a  
9 Stipulation and Order re: Non-Expert Discovery, Disclosure of Expert Witness, Expert Discovery  
10 and Hearing on Dispositive Motions, which was entered by the Court on November 29, 2007.

11 WHEREAS, given the current state of written discovery, it appears that the parties will  
12 need additional time to meet and confer, and that depositions will not begin until at least March  
13 2007; and

14 WHEREAS, the parties intend to work diligently to resolve the issues relating to written  
15 discovery and thereafter schedule and take depositions as soon as possible, they believe they are  
16 nevertheless unable to meet the current pre-trial deadlines in this case; and

17 WHEREAS, based on the foregoing, the parties believe that good cause exists to extend the  
18 current pre-trial deadlines and therefore stipulate and agree, and request that the Court order the  
19 following:

20 1. The cut-off date for non-expert discovery and disclosure of expert witnesses is  
21 hereby moved from March 23, 2007 to June 15, 2007 [or \_\_\_\_\_];

22 2. The cut-off date to complete expert discovery is hereby moved from May 14, 2007  
23 to July 20, 2007 [or \_\_\_\_\_];

24 3. The last day for hearing dispositive motions is hereby moved from July 11, 2007 to  
25 September 28, 2007 [or \_\_\_\_\_].

26 IT IS SO STIPULATED.  
27  
28

1 Dated: January 31, 2007

THE CHUGH FIRM, APC

2  
3 By: 

Johnny V. Phan, Esq.

4  
5 Attorneys for Defendants  
6 JNANA R. DASH, GREGORY D. HAWKINS,  
7 KARNA GLOBAL TECHNOLOGIES, INC., and  
8 KANNAN R. AYYAR

9  
10 Dated: January 31, 2007

BERGESON, LLP

11 By: 

Michael W. Stebbins, Esq.

12 Attorneys for Plaintiff  
13 TCGIVEGA INFORMATION TECHNOLOGIES  
14 PVT. LTD.

15  
16 **ORDER**

17 In accordance with the foregoing stipulation of the parties, and with good cause appearing  
18 therefor, the Court enters the Stipulation as an Order of the Court.

19  
20  
21 IT IS SO ORDERED.

22  
23 Dated: 2/5, 2007

24   
25  
26 JUDGE OF THE DISTRICT COURT  
27 JEREMY FOGEL  
28